

October 31, 2005

## COMMENTS

In the matter of:

Notice of Proposed Rule Making and Order, Docket 05-235

Submitted by:

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To the Commission:

Thank you very much for the opportunity to file comments relative to the Notice of Proposed Rule Making with regard to elimination of the Morse Code testing requirements in the Amateur Radio Service.

To eliminate the Morse Code requirement would be a huge mistake.

My position on this issue does not stem from nostalgia; nor from any kind of chauvinism (though I hold an Amateur Extra class license, and have for many years, earned in part through completing the then-20 words per minute exam; and have held a Second Class Radiotelegraph Operator's License, again earned in part through completing a similar exam).

Rather, my position is based in large part on the resulting loss of something very fundamental to the Amateur Radio Service as a SERVICE: The ability and skill necessary to provide communications in extreme emergency conditions, with simple equipment and techniques.

Communication can be effectively established and maintained via Morse Code, with very simple and inexpensive equipment which can, if needed, be assembled quickly with readily-obtainable components, all of which could be obtained by salvage. Nothing is simpler than building up a small, one-device (transistor, IC or even a tube) single-stage oscillator transmitter and perhaps a similar rudimentary regenerative-detector receiver; powered by batteries; and using this equipment to carry out basic communication under everyday and (especially) emergency conditions.

Only using a basic and simple mode of communication, Morse Code, is this possible.

Indeed, few things in life bring more pleasure and feelings of accomplishment. To do so is to touch, and harness, with one's own hands, the fundamental forces of the universe: The wild horses of electricity and magnetism.

Enough elevated language.... You may well ask, why bother, given the advanced technology of today's world?

The answer is simple: Because it will work. It will work when everything else fails.

The learning process, including the mastery of Morse Code at a very fundamental level -- and five words per minute is hardly a challenge to anyone -- and of the basics of electronics, imparts a sense of accomplishment. It unlocks the keys to the understanding of technology -- something too often lacking in our world today. How many times have you become totally frustrated with something as supposedly simple as programming a VCR, or setting up a computer? Even a basic understanding of electronics imparts a tremendous advantage, rather than being overwhelmed by things not understood. You will not learn "everything" there from, but you will have a clue; and not only that, you will have an idea which direction to go to find the answers.

Knowledge is neither very useful nor satisfying without a means to use it. Morse Code communication is fundamental. A fundamental mode needs only simple equipment.

Simple equipment is inexpensive. To retain the Morse Code requirement will encourage the continued development and use of inexpensive equipment.

Promotion of Amateur Radio as an inexpensive activity will serve to render Amateur Radio even more attractive, especially to those either with limited means, or to those who merely want to try something to test their interest and aptitude for it.

Increasingly today, Amateur Radio is perceived as an expensive and hi-tech pursuit. To eliminate the Morse requirement will have the unwanted result of discouraging, to the point of elimination, the basic entry-level route into Amateur Radio.

And let us not forget: In an emergency, the most vulnerable systems are the complex ones. Complex infrastructure-based technologies are all too often the first to go. A recent case in point is that of Hurricane Katrina, which brought about the early total loss of the 800-MHz communications system for the New Orleans Police Department when their sites and controls were destroyed.

Simple Morse Code communication can save the day, even if it is established from a pile of scrap parts and carried out by touching two bare wires together to "key" the transmitter.

Without the mastery of the basic skills involved, however, all this becomes moot.

Many would-be Amateur Radio newcomers today argue that Morse is no longer needed, and presents a "hardship" of some kind. They do not believe they should be imposed upon to learn something they either profess no interest in, or ever intend to use. To those people, I ask, if you were going to live in France, Germany, Russia or

Japan, would you not have to learn the language? Would you not have to learn to read music, in order to play a musical instrument in an accomplished manner?

Morse Code is the basic, fundamental and universal language of Amateur Radio. It takes no special, complex and expensive equipment in addition to a transmitter and receiver to “read” the transmissions. All it takes, is skill. The skills are easily mastered, if one only rises to the challenge and applies oneself. The result is an exceptional ability for the everyday, and unique usefulness in time of crisis.

Do not eliminate the Morse Code requirement. To do so will be to compromise the quality of the Amateur Radio Service, and by extension, place our public safety and even national security in jeopardy.